

DECLARATION

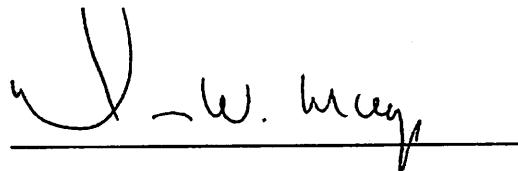
This affidavit is submitted in support of a complaint for forfeiture of \$10,502.00 in United States currency.

I, Dennis W. Maye, Special Agent of the Drug Enforcement Administration, submit that there are sufficient facts to support a reasonable belief that the \$10,502.00 in United States currency constitutes (1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds traceable to such an exchange; and (3) money, negotiable instruments, and securities used and intended to be used to facilitate a violation of the Controlled Substances Act in violation of 21 U.S.C. § 841 and thus is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

- a. During the month of November 2012, members of the Baltimore County Police Narcotics Section / Central-Community Drug Unit ("the BCPD"), began an investigation on Pierce Dalton Nicora ("P. Nicora") regarding his involvement in the distribution of marijuana.
- b. Members of the BCPD were familiar with P. Nicora from prior investigations.
- c. As a result of this investigation, on April 15, 2013, members of the BCPD obtained and executed a search and seizure warrant at P. Nicora's residence, located at 20 Weyfield Court, Rosedale, Maryland 21237 ("the Residence").
- d. At the time members of the BCPD executed the search and seizure warrant, the Residence was unoccupied.
- e. While members of the BCPD were conducting the search of the Residence, P. Nicora's brother, Morgan Scott Nicora ("M. Nicora") and Angie Gesell ("Gesell") pulled up and parked in front of the Residence.
- f. Members of the BCPD brought M. Nicora and Gesell into the Residence and detained them.
- g. M. Nicora told members of the BCPD that he and Gesell use the rear left bedroom and that P. Nicora uses the rear right bedroom.
- h. P. Nicora's bedroom contained the following:
 1. A large bag containing approximately 10 ounces of marijuana;
 2. Three digital scales with marijuana residue;
 3. A rifle;
 4. \$10,502.00 in United States currency, located in a safe under P. Nicora's bed.
- i. M. Nicora's bedroom contained drug-related evidence and guns.

- j. The living room contained drug-related evidence.
- k. Gesell's purse contained drug-related evidence.
- l. P. Nicora came to the police precinct where his brother M. Nicora was being processed. At that time, P. Nicora was arrested and charged with felony possession of marijuana.
- m. P. Nicora's criminal history contains prior drug charges, including: possession of marijuana, possession with intent to distribute a controlled dangerous substance, and possession of drug paraphernalia.
- n. A wage report revealed that P. Nicora has earned no reported legitimate income in the State of Maryland since the second quarter of 2008.

I DECLARE UNDER THE PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. § 1746 THAT THE FACTS SUBMITTED BY THE BALTIMORE COUNTY POLICE DEPARTMENT, IN REFERENCE TO THE SEIZURE OF \$10,502.00 IN UNITED STATES CURRENCY FROM PIERCE DALTON NICORA ARE ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.



Dennis W. Maye
Special Agent
Drug Enforcement Administration